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Attorney for Defendants Charles Miller,  
Pierre Chao and John Mei, and David  
Oldham

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**NORTHERN DIVISION**

In re:

CHANNEL TECHNOLOGIES GROUP,  
LLC,

Debtor.

No. 9:16-bk-11912-DS

Chapter 7

CORPORATE RECOVERY  
ASSOCIATES, LLC, as Trustee for the  
Liquidating Trust of Channel Technologies  
Group, LLC,

Plaintiff,

vs.

Kevin Ruelas, Pierre Chao, John Mei, Lynn  
Chen, Christopher Holmes, Mark Shaw,  
Charles Miller, David Oldham, and DOES  
1-10,

Defendants.

Adv. No. 9:18-ap-01070-DS

**STIPULATION TO EXTEND DEADLINE  
TO RESPOND TO COMPLAINT**

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware.

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware.

Defendants Charles Miller ("Miller"), Pierre Chao ("Chao"), John Mei ("Mei") and David Oldham (collectively, "Defendants"), and Corporate Recovery Associates, as Trustee for the Liquidating Trust of Channel Technologies Group, LLC ("Plaintiff") (Defendants, and Plaintiff, the "parties"), by and through their respective attorneys, hereby enter into this stipulation ("Stipulation") as follows:

1. Defendants removed this action from the Superior Court of California for the County of Santa Barbara to this Bankruptcy Court on November 14, 2018.

2. The current deadline for Mr. Chao and Mr. Mei to respond to Plaintiff's complaint is November 21, 2018, the current deadline for Mr. Miller is November 29, 2018, and the current deadline for Mr. Oldham is December 3, 2018.

3. Defendants have requested, and Plaintiff has agreed—subject to the stipulation set forth in Paragraph 4 below—to extend Defendants' time to respond to the complaint in this action to December 21.

4. The parties agree that nothing herein shall constitute or be deemed a waiver of any forthcoming challenge by Plaintiff to Defendants' removal of this lawsuit and that this Stipulation shall not operate to bar or otherwise estop Plaintiff, in any manner, from seeking remand of this action to state court.

NOW, THEREFORE, Defendants respectfully request, pursuant to the parties' stipulation herein, that the Court continue the deadline to file a response to the complaint for each of the Defendants to December 21, 2018.

DATED: November 20, 2018

REED SMITH LLP

By: /s/ Christopher O. Rivas  
David M. Halbreich  
Christopher O. Rivas

Counsel for Defendants Charles Miller, Pierre Chao, John Mei and David Oldham

1  
2 DATED: November 20, 2018

LYNN PINKER COX HURST

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4 By 

Christian Orozco

Attorneys for Plaintiff

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11 REED SMITH LLP  
A limited liability partnership formed in the State of Delaware.  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
355 South Grand Avenue, Suite 2900, Los Angeles, CA 90071

A true and correct copy of the foregoing document entitled (*specify*): STIPULATION TO EXTEND DEADLINE TO  
RESPOND TO COMPLAINT

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) November 20, 2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

United States Trustee (ND) [ustpreion16.nd.ecf@usdoj.gov](mailto:ustpreion16.nd.ecf@usdoj.gov)  
Brian D Fittipaldi [brian.fittipaldi@usdoj.gov](mailto:brian.fittipaldi@usdoj.gov)

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) November 20, 2018, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Edward Jason Dennis  
Samuel B. Hardy  
Christian A. Orozco  
LYNN PINKER Cox & HURST, LLP  
2100 Ross Avenue, Suite 2700  
Dallas, Texas 75201

Office of The United States Trustee  
1415 State Street, Suite 148  
Santa Barbara CA, 93101

Mark Shaw  
4999 Cervato Way  
Santa Barbara, CA 93111

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) November 20, 2018, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Deborah Saltzman, Judge  
USBC, Central District of CA  
1415 State St.  
Santa Barbara, CA 93101-2511

☐ Service information continued on attached page

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 20, 2018

*Date*

Sean Wilson

*Printed Name*

/s/ Sean Wilson

*Signature*

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.